

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:23-cr-00087

v

MCKHAELA KATELYN
MCNAMARA

HON. JANE M. BECKERING
U.S. DISTRICT CHIEF JUDGE

Defendant.

/

**DEFENDANT MCKHAELA MCNAMARA'S PRE-SENTENCING MOTION FOR A
VARIANCE BELOW THE ADVISORY GUIDELINES RANGE**

Defendant, McKhaela McNamara, respectfully moves this Honorable Court pursuant to 18 U.S.C. §3553(a)(2) for a departure from, and/or a variance below, the applicable, properly ascertained advisory guidelines range, based on the legal principles and statements outlined in her Sentencing Memorandum, filed contemporaneously with this Motion.

WHEREFORE, Defendant, McKhaela McNamara, respectfully requests that this Honorable Court independently determine an appropriate sentence and vary below the advisory guidelines range in order to reach a term of incarceration that is sufficient but not greater than necessary meet the objectives of a just federal sentence, and the ends of justice. 18 U.S.C. § 3553(a).

Dated: May 1, 2024

/s/ John M. Karafa
John M. Karafa (P36007)
Attorney for Defendant McNamara